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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	Case No.: CR 11-00683 BLF
	)	CR 12-00426 BLF
Plaintiff,	)	
	)	STIPULATION EXCLUDING TIME UNDER THE
v.	)	SPEEDY TRIAL ACT; [PROPOSED] ORDER
	)	
CHRISTOPHER DOYON,	)	
	)	
Defendant.	)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Christopher Doyon, that time be excluded under the Speedy Trial Act from July 20, 2021 through October 12, 2021.

At the initial appearance held on July 20, 2021, the government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery that the government will produce to him. For this reason and as further stated on the record at the status conference, the parties stipulate and agree that excluding time until October 12, 2021 will allow for the effective preparation of counsel. See 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding

the time from July 20, 2021 through October 12, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT SO STIPULATED.

DATED: 7/20/21

Respectfully submitted,

STEPHANIE M. HINDS  
Acting United States Attorney

/s/ Susan Knight  
SUSAN KNIGHT  
Assistant United States Attorney

/s/ Jay Rorty  
JAY RORTY  
Counsel for Mr. Doyon

**[PROPOSED] ORDER**

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on July 20, 2021 and for good cause shown, the Court finds that failing to exclude the time from July 20, 2021 through October 12, 2021 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from July 20, 2021 to October 12, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from July 20, 2021 through October 12, 2021 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED:

HONORABLE BETH LABSON FREEMAN  
United States District Judge